

REMARKS

The above Amendments and these Remarks are in reply to the Office Action mailed February 24, 2006. Claims 1-6 and 23-26 are currently pending.

Objection to Specification

The disclosure is objected to because of containing an informality. The informality has been corrected and it is therefore respectfully requested that the objection be withdrawn.

Rejection of Claims 1-6 and 23-26 Under 35 U.S.C. §102(e)

Claims 1-6 and 23-26 are rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,167,120 (“Kikinis”). Applicants respectfully traverse the rejection as follows.

Kikinis relates to a home server unit including a communication bus, a processor and memory for connecting digital devices within the home server interface unit. The home server unit is connected to a plurality of PCs and other peripherals. The home server unit includes a network and telephone adaptor for connecting to a wide area network and to a telephony device. The processor manages data transfers between connected PCs/peripherals and one or more service providers accessed via the wide-area network. As stated in Kikinis, embodiments of the invention are directed to “[solving] the existing problem of providing wide area network access to multiple computerized appliances without requiring multiple service accounts.” (Kikinis, Col. 2, line 45-47).

Each of claims 1-6 and 23-26 recite, in one form or another, a system for providing access to “a base device identified with a user of a remote client device,” where the communication between the remote device and the base device is initiated by the base device.

- “a user server operatively coupled to said web server and said remote client device, said user server further configured to communicate data between the base device and the user of the remote client device, said user server further configured to communicate data with said base device *via requests initiated by said base device.*” (Claims 1-6).
- “communicating data between the base device and the remote client device via said user server *from requests initiated by said base device.*” (Claims 23-26).

In general, in accordance with the present invention, a user of a remote device 54 will make a request (for example to read or write information) that is communicated to a user server module 18. Periodically, the

base device 42 will initiate contact with the user server module 18 to see if a request has come in. This feature is explained in the present application for example at page 23, lines 14-23:

Preferably, communications between the base device 42 and the Sili server 30 are initiated by the base device 42. For example, a base device 42 which maintains a full time Internet connection is generally configured to periodically communicate "job request" commands at a predetermined interval (e.g., forty (40) seconds) to the Sili server 30. In response, the Sili server 30 may indicate "no job" or "job request by a user server module". "No job" is communicated where the user associated with the base device 42 is not requesting data at this time. "Job request by a user sever module" is communicated when the user associated by the base device 42 is requesting data (which is indicated to the Sili server 30 by the agent communication module 60 as noted above).

The advantages of such a system are explained in the present application at page 26, line 19 through page 27, line 8:

As described above, communication sequences between the system 10 (Sili server 30 and user server module 18) and the base device 42 are generally initiated by the base device 42, rather than the system 10. . . This arrangement provides several advantages which overcomes problems associated with the prior art. First, security is increased since the data communications are initiated by the base device rather than by the system 10. By requiring the base device to initiate communication (and therefore establish a connection socket), hacking into the base device from the outside becomes a more difficult task. Additionally, the invention may be practiced even if the base device is behind firewall because the base device initiates communication and opens the connection to the agent communication module, thereby allowing reply communications and task commands to be communicated from the agent communication module.

Kikinis is wholly unrelated to addressing the problem of increased security and accessing secure information from a base device behind a firewall, and does not disclose, teach or in any way suggest the claimed invention. The Examiner indicated that the feature of requests being initiated by the base device was shown in Kikinis, specifically in Fig. 1, Col. 4, lines 30-55 and Col. 2, lines 30-47 of the reference. However, applicants respectfully submit that the claimed invention including requests initiated by the base device identified with a user is not shown at the cited portions of the reference, or anywhere else

within the reference. In the claimed invention, it is recited that communications are initiated by a base device “identified with a user.” The Examiner has alleged that this feature is shown by support technician workstation 122 included as part of an Internet service provider. Kikinis mentions the support technician workstation in a single sentence:

Returning again to the service provider's end of the system, Multi-Bridge Adapter Unit 120 connects to an Ethernet™ backbone 121 (in this particular embodiment) to which various equipment may be interfaced, such as a server 123 shown and a support technician workstation 122. (Col. 4, lines 50-55).

Support technician workstation 122 is not a base device identified with the user and support technician workstation does not initiate communications.

Kikinis has no disclosure, teaching or suggestion of any kind of the above-discussed claim limitations relating to communications being initiated by the base device identified with a user. This may in part be explained by the fact that Kikinis is not concerned with and does not address the problem of increased security and accessing secure information from a base device behind a firewall.

It is axiomatic that each and every claim limitation must be found in a single prior art reference to support a rejection under §102. *Apple Computer, Inc. v. Articulate Systems, Inc.*, 234 F.3d 14, 20 (Fed. Cir. 2000). Omission of any claimed element, no matter how insubstantial, is grounds for traversing a rejection based on §102. *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542 (Fed. Cir. 1983). As Kikinis has no disclosure, teaching or suggestion of a remote access system where communication is initiated by the base device, and as Kikinis does not even address the problem to which this solution is directed, it is respectfully submitted that the invention recited in Claims 1-6 and 23-26 is patentable over the cited reference. It is therefore respectfully requested that the rejection of these claims on §102 grounds be withdrawn.

Based on the above amendments and these remarks, reconsideration of claims 1-6 and 23-26 is respectfully requested.

The Examiner's prompt attention to this matter is greatly appreciated. Should further questions remain, the Examiner is invited to contact the undersigned attorney by telephone.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 501826 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

Date: August 24, 2006

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